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14 UNITED STATES DISTRICT COURT
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16 NORTHERN DISTRICT OF CALIFORNIA
17
18 SAN FRANCISCO DIVISION

19 MAXIMILIAN KLEIN, et al., on behalf of
20 themselves and all others similarly situated,

21 Plaintiffs,

22 v.

23 META PLATFORMS, INC.,

24 Defendant.

25 Consolidated Case No. 3:20-cv-08570-JD

26 **DECLARATION OF AMANDA F.
LAWRENCE IN SUPPORT OF
ADVERTISER PLAINTIFFS' REPLY
MEMORANDUM IN SUPPORT OF
MOTION FOR CLASS CERTIFICATION**

27 Hearing Date: December 14, 2023

28 Hearing Time: 10:00 a.m.

Courtroom: 11, 19th Floor

Judge: The Honorable James Donato

1 I, Amanda F. Lawrence, declare as follows:

2 1. I am an attorney admitted *pro hac vice* in this action (the “Action”). I am a partner at
3 Scott+Scott Attorneys at Law LLP, interim Co-Lead Counsel for the Advertiser Classes in the Action.
4 I submit this declaration in support of Advertiser Plaintiffs’ Reply Memorandum in Support of Motion
5 for Class Certification. The contents of this declaration are based on my personal knowledge,
6 including my personal knowledge of the documents cited herein. The facts set forth herein are within
7 my personal knowledge and if called as a witness, I could and would competently testify to them.

8 2. Attached hereto as ***Exhibit 1*** is a true and correct copy of Section 657 of Phillip A.
9 Areeda & Herbert Hovenkamp, *Antitrust Law: An Analysis of Antitrust Principles and Their*
10 *Application* (2023).

11 3. Attached hereto as ***Exhibit 2*** is a true and correct copy of Section 320 of Phillip A.
12 Areeda & Herbert Hovenkamp, *Antitrust Law: An Analysis of Antitrust Principles and Their*
13 *Application* (2023).

14 4. Attached hereto as ***Exhibit 3*** is a true and correct copy of excerpts from Chapter 4 of
15 Am. Bar Ass’n, *Proving Antitrust Damages: Legal and Economic Issues* (3d ed. 2017).

16 5. Attached hereto as ***Exhibit 4*** is a true and correct copy of excerpts from the Deposition
17 Transcript of Catherine Tucker, Ph.D, dated September 26, 2023.

18 6. Attached hereto as ***Exhibit 5*** is a true and correct copy of a document produced by
19 Meta Platforms, Inc. (“Meta”) in this action bearing Bates-stamp PALM-FTC-00292605.

20 7. Attached hereto as ***Exhibit 6*** is a true and correct copy of excerpts from the Deposition
21 Transcript of Alex Schultz, dated March 31, 2023.

22 8. Attached hereto as ***Exhibit 7*** is a true and correct copy of a document produced by
23 Meta in this action bearing Bates-stamp PALM-006974711.

24 9. Attached hereto as ***Exhibit 8*** is a true and correct copy of a document produced by
25 Meta in this action bearing Bates-stamp PALM-003309653.

26 10. Attached hereto as ***Exhibit 9*** is a true and correct copy of a document produced by
27 Meta in this action bearing Bates-stamp PALM-005037545.

1 11. Attached hereto as ***Exhibit 10*** is a true and correct copy of a document produced by
2 Meta in this action bearing Bates-stamp PALM-013912488.

3 12. Attached hereto as ***Exhibit 11*** is a true and correct copy of a document produced by
4 Meta in this action bearing Bates-stamp PALM-000777305.

5 13. Attached hereto as ***Exhibit 12*** is a true and correct copy of excerpts from the
6 Deposition Transcript of Mark Geoffrey Young, dated February 13, 2023.

7 14. Attached hereto as *Exhibit 13* is a true and correct copy of excerpts from the
8 Deposition Transcript of Katherine Looper, dated October 7, 2022.

9 15. Attached hereto as ***Exhibit 14*** is a true and correct copy of excerpts from the
10 Deposition Transcript of Mark Berney, dated May 25, 2023.

11 16. Attached hereto as *Exhibit 15* is a true and correct copy of excerpts from the
12 Deposition Transcript of Jessyca Frederick, dated June 8, 2023.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct. Executed on this 3rd day of November, 2023 at Colchester, Connecticut

/s/Amanda F. Lawrence
Amanda F. Lawrence

CERTIFICATE OF SERVICE

19 I hereby certify that on November 3, 2023, I caused a true and correct copy of the foregoing
20 document to be served by electronic mail on all counsel of record.

21 | Dated: November 3, 2023

By: */s/Amanda F. Lawrence*
Amanda F. Lawrence